

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

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LEONARD C. WALCZYK, ESQ. (LW-4720)

In Re:

WALSH SECURITIES, INC.,

Debtor.

Case No.: 10-44845

Hon. Novalyn L. Winfield

Chapter: 11

Hearing Date: August 29, 2011 at 10:00 a.m.

**NOTICE OF MOTION TO COMPEL TURNOVER OF PROPERTY TO
THE ESTATE PURSUANT TO 11 U.S.C. SECTION 542(e)**

TO: John J. Oberdorf, Jr., Esq.
LeClairRyan
One Riverfront Plaza
1037 Raymond Boulevard
Sixteenth Floor
Newark, New Jersey 07102

PLEASE TAKE NOTICE, that Walsh Securities, Inc. the Chapter 11 Debtor herein (the “Debtor”), through its counsel, has filed a Motion to Compel Turnover of Property to the Estate Pursuant to 11 U.S.C. Section 542(e) and for such other and further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE, that any response to the Motion must be in writing and filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, P. O. Box 1352, Newark, New Jersey 07102 and simultaneously served on counsel for the Movant at Wasserman, Jurista & Stolz, P.C., 225 Millburn Avenue, Suite 207, P. O. Box 1029,

Millburn, New Jersey 07041 (attention Leonard C. Walczyk, Esq.) so as to be received no later than seven (7) days prior to the hearing date.

PLEASE TAKE FURTHER NOTICE, that Court will hold a hearing on the Motion on August 29, 2011 at 10:00 a.m. before the Honorable Novalyn L. Winfield, United States Bankruptcy Judge at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr., Federal Building, 50 Walnut Street, Newark, New Jersey 07102. If a written objection to the Motion is not filed and served by the objection deadline, the Court may grant the relief requested in the Motion without further notice or a hearing.

PLEASE TAKE FURTHER NOTICE, that Movant requests oral argument if any opposition to the Motion is filed.

STATEMENT OF NON-NECESSITY OF BRIEF

The Movant certifies pursuant to D.N.J. LBR9013-2 that the within Motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

WASSERMAN, JURISTA & STOLZ, P.C.
Attorneys for Walsh Securities, Inc., Debtor

By 

LEONARD C. WALCZYK

Dated: August 4, 2011.